


UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

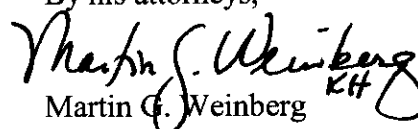
UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 04-10060-RCL
	)	
GEORGE SCHUSSEL,	)	
Defendant	)	

**DEFENDANT GEORGE SCHUSSEL'S ASSENTED-MOTION TO FILE REPLY  
MEMORANDUM UNDER SEAL**

Now comes the defendant George Schussel in the above-captioned case and respectfully moves that this Honorable Court permit him to file his Reply to Government's Response to Defendant's Reply to Government's Opposition to Defendant's Motion to Suppress Evidence On Claim of Privilege under seal.


As reason therefor, defendant states that the Reply contains discussion of the contents of documents and other communications which the defendant contends are protected by the attorney-client privilege and the work-product privilege, and filing under seal is necessary to prevent public disclosure of privileged communications. Previous filings directed to this issue by both the defendant and the government have been filed under seal. AUSA Carmen Ortiz assents to the granting of this motion.

  
Francis J. DiMento *KH*  
DiMento & Sullivan  
7 Faneuil Hall Marketplace  
Boston MA 02109  
(617) 523-2345

Respectfully submitted,  
By his attorneys,  
  
Martin G. Weinberg *KH*  
Mass. Bar No. 519480  
20 Park Plaza, Suite 905  
Boston MA 02116  
(617) 227-3700

**CERTIFICATE OF SERVICE**

I, Martin G. Weinberg, hereby certify that on this 18th day of March, 2005, I served one copy of the foregoing Motion, by hand-delivery, on Carmen M. Ortiz, AUSA, United States Attorney's Office, Moakley United States Courthouse, 9<sup>th</sup> floor, 1 Courthouse Way, Boston, Massachusetts 02210.

  
Martin G. Weinberg *KH*